

Barnes, Iaccarino, Virginia, Ambinder & Shepherd, PLLC
ATTORNEYS AT LAW

ROY BARNES
RICCARDO IACCARINO
CHARLES R. VIRGINIA**
LLOYD R. AMBINDER**
WENDELL V. SHEPHERD

TRINITY CENTRE
111 BROADWAY
SUITE 1403
NEW YORK, NEW YORK 10006
(212) 943-9080
FAX (212) 943-9082

258 Saw Mill River Road
Elmsford, New York 10523
Tel (914) 592-5740
Fax (914) 592-3213

3 Surrey Lane
Hempstead, N.Y. 11550
Tel (516) 483-2990
Fax (516) 483-0566

5 Mountain Avenue
North Plainfield, N.J. 07060
Tel (908) 757-2067
Fax (908) 753-2238

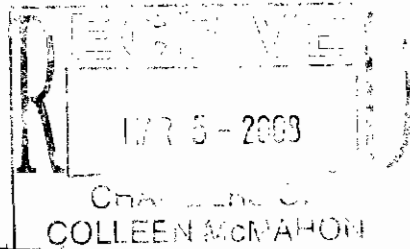
OF COUNSEL:

MARC A. TENENBAUM^***
ALBERT RODRIGUES
GIACCHINO RUSSO

(Please refer all correspondence to the New York address)

KARIN ARROSPIDE
DANIELLE M. CARNEY
NICOLE E. COHEN*
DANA L. HENKE^
STEVEN KERN^^
SAMER E. KHALAF***+
LADONNA M. LUSHER
HEIDI MAHER
GILLIAN MCGOEY^^
JAMES E. MURPHY
KELLIE TERESE WALKER
JUDY S. WONG

March 5, 2008

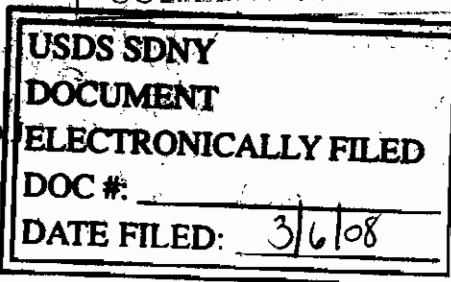


- * Also Admitted in MA
- ** Also Admitted in NJ
- *** Also Admitted in OH
- ^ Also Admitted in DC
- ^^ Also Admitted in CT
- + Also Admitted in MD

MEMO ENDORSED

Via Facsimile Transmission
Facsimile No.: (212) 805-6326

Hon. Colleen McMahon, U.S.D.
United States Courthouse
500 Pearl Street
New York, New York 10007



Re: Trustees of the District 6 Health Plan v. Dove Laundry
Docket No. 08 Civ. 38 (CM)(GWG)

Dear Judge McMahon:

This firm represents the Plaintiffs in the above-referenced matter. On January 3, 2008, Plaintiffs, trustees of a multiemployer benefit plan, commenced this action for, *inter alia*, collection of employee fringe benefit contributions under the Employee Retirement Income Security Act of 1974, 29 U.S.C. § 1001, *et seq.* On February 5, 2008, Defendant Dove Laundry was served with process. Subsequent to service of process, Defendant's attorney contacted our firm seeking to resolve this lawsuit.

The parties have tentatively scheduled a meeting for March 14, 2008, at which time documents will be exchanged and settlement discussed. In light of the parties' desire to resolve this matter, and in an effort to conserve judicial time and resources, the parties respectfully request a 30-day adjournment of the initial conference scheduled in this matter for March 5, 2008. Please find enclosed a Stipulation to Adjourn Conference for the Court's review. Also enclosed is the parties' proposed Civil Case Management Plan ("CMP"). Please note that the

Adjourn to April 11 at 9 AM
Colleen McMahon
3/6/08

Hon. Colleen McMahon, U.S.D.J.

2

March 5, 2008

parties did not complete the CMP because this matter is an ERISA benefits case, which is an exception to the Court's order requiring the CMP. However, in the spirit of cooperation and the parties' good faith efforts to resolve this matter, we have submitted the proposed CMP for the Court's review.

Respectfully submitted,



Kellie Terese Walker

KTW:aa

Enclosures

cc: For Defendant – Stuart A. Weinberger, Esq. (via e-mail transmission)

U:\Winword Documents\District 6 Benefit Funds\Collections\Dove\March 5, 2008 Letter to J McMahon.doc